



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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BILL LEE
GOVERNOR

DANIELLE W. BARNES
COMMISSIONER

May 29, 2020

David Evans, Board Chair
Child Development Schools, Incorporated
6053 Veterans Parkway, Building 300
Columbus, GA 31909-4688

Dear Mr. Evans,

The Department of Human Services (DHS) - Division of Audit Services staff conducted a desk review of the Child and Adult Care Food Program (CACFP) at Child Development Schools, Incorporated, (Sponsor), Application Agreement number 00201, on April 22, 2020. The purpose of this review was to determine if the Sponsor complied with the *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreement, and applicable Federal and State regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor had seven (7) feeding sites operating during the review period. The centers CNI #34, CNI #135, and CNI #168 were selected as the sample.

Background

CACFP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplement meals served. Meals served by participating Sponsors must meet the minimum guidelines set by the United States Department of Agriculture (USDA) and DHS to be eligible for reimbursement. The CACFP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) to seek reimbursement.

We inspected meal count sheets for our test period and reconciled the meals claimed to the meals reported as served for each meal service. We also assessed compliance with civil rights requirements. We observed a PM supplement meal service at CNI #34 on March 10, 2020, a breakfast service at CNI #135 on March 10, 2020, and a lunch service at CNI #168 on March 10, 2020. Our review revealed no deficiencies.

Important COVID-19 note: Due the current outbreak and the risk that COVID19 poses to your organization personnel and our staff, all our staff are working from home with no or very limited access to the office. Therefore, we will not send a copy of this report via regular mail until further

notice. Please confirm the receipt of this email as it is currently the option to communicate to you. If you need any assistance or have any questions, please do not hesitate to contact us via email.

Our review of the sponsor's records for March 2020 disclosed the following:

1. The Sponsor incorrectly reported the number of meals served the date of the monitoring site visit

Condition

Based on our observation and our review of the Claim for Reimbursement for March 2020, we found the number of meals claimed at two sites differed from the number claimed as follows:

Center	Date	Meal	Observed	Claimed	Exhibit
CNI 34	3/10/2020	Supplement	39	42	B
CNI 135	3/10/2020	Breakfast	71	67	C

As a result, four (4) breakfast meals were underreported and three (3) supplements were over claimed.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.10(c) states, "... In submitting a Claim for Reimbursement, each institution shall certify that the claim is correct and that records are available to support that claim...."

Recommendation

The Sponsor should ensure that claims for reimbursement are completed correctly and based on accurate supporting documents.

2. The Sponsor did not complete monitoring of its feeding sites as required

Condition

Based on our review of the monitoring documents provided, we noted that the forms completed on August 28, 2019 (at CNI #135) and December 19, 2019 (at CNI #34 and #135) showed no indication of whether the visits were announced or unannounced.

Criteria

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(iii) states, "... "Sponsoring organizations must review each facility three times each year, except as described in paragraph (d)(4)(iv) of this section. In addition: (A) at least two of the three reviews must be unannounced; (B) At least one unannounced review must include observation of a meal service; (C) At least one review must be made during each new facility's first four weeks of Program operations; and (D) Not more than six months may elapse between reviews."

Recommendation

The Sponsor should ensure that monitoring documents are completed correctly to demonstrate

compliance with requirements.

Technical Assistance Provided

Technical assistance was provided via email regarding required postings and infant menus on March 10, 2020.

Corrective Action

The Sponsor must complete the following actions within 30 days from the date of this report:

- Prepare and submit a corrective action plan to address the deficiencies identified in this report. The corrective action plan template is attached. Please return the corrective action plan to:

AuditServices.CAPS.DHS@tn.gov

If you have questions relative to the corrective action plan, please contact:

Allette Vayda, Director of Operations
Child and Adult Care Food Program
James K. Polk Building, 15th Floor
505 Deaderick Street
Nashville, Tennessee 37243
Allette.Vayda@tn.gov
(615) 313-3769

We appreciate the assistance provided during this review. If you have any questions regarding this report, please contact Sean Baker, Audit Director 2, at 615-313-4727 or Sean.Baker@tn.gov.

Sincerely,



Sam O. Alzoubi, CFE
Director of Audit Services

Exhibit

cc: Julee Williams, USDA Coordinator, Child Development Schools, Incorporated
Allette Vayda, Director of Operations, Child and Adult Care Food Programs
Debra Pasta, Program Manager, Child and Adult Care Food Program
Elke Moore, Administrative Services Assistant 3, Child and Adult Care Food Program
Constance Moore, Program Specialist, Child and Adult Care Food Program
Marty Widner, Program Specialist, Child and Adult Care Food Program
Comptroller of the Treasury, State of Tennessee

EXHIBIT A

Verification of CACFP Sponsor of Affiliated Centers Claim

Sponsor: Child Development Schools, Inc.

Review Month/Year: March 2020

Total Reimbursement: \$25,229.06

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	22	22
Total Attendance	6,785	6,785
Number of Breakfasts Served	5,494	5,498
Number of Lunches Served	6,551	6,551
Number of Supplements Served	6,188	6,185
Number of Participants in Free Category	252	NA ¹
Number of Participants in Reduced-Price Category	50	NA ¹
Number of Participants in Paid Category	209	NA ¹
Total Number of Participants	511	NA ¹
Total Number of Centers	7	7

¹The number of participants and their classifications was not verified due to the limited review because of COVID-19

EXHIBIT B**Verification of Affiliated Sponsored Center Data****Center: CNI #34**

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	22	22
Total Attendance	727	727
Percentage of Participants in the Free or Reduced-price Category (For Proprietary Center Only)	70%	NA ¹
Number of Breakfasts Served	597	597
Number of Lunches Served	702	702
Number of Supplements Served	612	609
Number of Participants in Free Category	41	NA ¹
Number of Participants in Reduced-Price Category	4	NA ¹
Number of Participants in Paid Category	19	NA ¹
Total Number of Participants	64	NA ¹

¹The number of participants and their classifications was not verified due to the limited review because of COVID-19

EXHIBIT C

Verification of Affiliated Sponsored Center Data

Center: CNI #135

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	22	22
Total Attendance	1,323	1,323
Percentage of Participants in the Free or Reduced-price Category (For Proprietary Center Only)	84%	NA ¹
Number of Breakfasts Served	1,153	1,157
Number of Lunches Served	1,268	1,268
Number of Supplements Served	1,215	1,215
Number of Participants in Free Category	78	NA ¹
Number of Participants in Reduced-Price Category	6	NA ¹
Number of Participants in Paid Category	16	NA ¹
Total Number of Participants	100	NA ¹

¹The number of participants and their classifications was not verified due to the limited review because of COVID-19

EXHIBIT D

Verification of Affiliated Sponsored Center Data

Center: CNI #168

Site Meal Service Activity and Monitor Reconciliation	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	22	22
Total Attendance	957	957
Percentage of Participants in the Free or Reduced-price Category (For Proprietary Center Only)	68%	NA ¹
Number of Breakfasts Served	822	822
Number of Lunches Served	942	942
Number of Supplements Served	923	923
Number of Participants in Free Category	37	NA ¹
Number of Participants in Reduced-Price Category	7	NA ¹
Number of Participants in Paid Category	21	NA ¹
Total Number of Participants	65	NA ¹

¹The number of participants and their classifications was not verified due to the limited review because of COVID-19